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Reno, Nevada 89501
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4 Email: lbubala@kcnvlaw.com

5 Ronald P. Oines (CA Bar No. 145016)
Admitted Pro Hac Vice
6 Rutan & Tucker, LLP
18575 Jamboree Road, 9th Floor
7 Irvine, California 92612
Telephone: (714) 641-5100
8 Facsimile: (714) 546-9035
Email: roines@rutan.com

9 Attorneys for Creditor
10 GEO-LOGIC ASSOCIATES, INC.

11 UNITED STATES BANKRUPTCY COURT
12 DISTRICT OF NEVADA

13 In Re:

14 METAL RECOVERY SOLUTIONS, INC.,
15 aka MRS, INC.,

16 Debtor(s)

Case No. 20-50660-gs
Chapter 7

**DECLARATION OF LOUIS M.
BUBALA III IN SUPPORT OF
CREDITOR GEO-LOGIC
ASSOCIATES, INC.'S MOTION
TO ALLOW GLA'S
ADMINISTRATIVE EXPENSES
INCURRED OBJECTING TO
DIFFERENTIAL ENGINEERING,
INC.'S CLAIMS**

**Hearing Date: 10/6/23
Hearing Time: 1:30 p.m.
Hearing Location: Zoom**

DECLARATION OF LOUIS M. BUBALA III

I, Louis M. Bubala III, declare as follows:

1. I am Of Counsel at the law firm of Kaempfer Crowell, counsel of record for Geo-Logic Associates, Inc. ("GLA") in this bankruptcy case. I am and have been a member in good standing of the State Bar of Nevada since my admission in 2004, and I have been and am admitted to this Court since 2005.

2. I make this Declaration in support of GLA's Motion to allow GLA's Administrative Expenses Incurred in Objecting to Differential Engineering, Inc.'s Claims. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

3. I am based in Reno, Nevada, and my firm's only offices are in Nevada. In 2017, my firm and I were contacted by GLA's outside counsel, Rutan & Tucker LLP, about representing GLA in litigation in Nevada with debtor Metal Recovery Associates, Inc. ("MRS"), its principal Thom Seal ("Seal") and a related entity, Differential Engineering, Inc. ("Differential").

4. Ronald P. Oines of Rutan & Tucker LLP was GLA's primary attorney through the litigation, appeal, bankruptcy and bankruptcy appeal. Mr. Oines was involved throughout due to his extensive knowledge of the substantive issues and historical knowledge of the parties and relationships. I served as his local counsel in litigation and remained so during the bankruptcy. Mr. Oines provides a contemporaneous supporting declaration with an accurate description of the history of the dispute, including and specifically of the objections to Differential's claims and its appeal from this Court's order.

5. In my capacity as bankruptcy and local counsel, my firm and I have provided substantial assistance in negotiations and discussions with the bankruptcy counsel in and out of Nevada on this case, including on the Objections. My firm also was substantively involved in evaluating, researching and drafting the arguments and briefs in the Objections and the resulting appeal.

1 6. As further detailed in the invoices attached as Exhibit 1, here is a
2 summary of the work done by my firm in connection with the Objection. My firm is
3 not seeking recovery of any costs incurred with the objections or for the bill of costs
4 filed in this Court following the appellate decision.

5 a. I engaged in discussions with Mr. Oines and with the trustee and
6 his counsel on issues about standing, grounds, evidence and
7 additional discovery involved in the prosecution of the
8 Objections. Additionally, since the substantive questions of
9 bankruptcy law are within my primary practice area, I engaged in
10 much of the legal research on these points, as well drafting of the
11 objection, including subsequent briefs in conjunction with the
12 claim objection and Differential's appeal.

13 b. There were multiple disputes in the early stages of the contested
14 matter including arguments over claim preclusion, a motion to
15 quash subpoenas, protective orders and scheduling of hearings.
16 Each of these required my personal involvement and legal
17 research for the points to present to opposing counsel and the
18 Court. My firm also dealt with related issues on the timing and
19 scope of discovery in the claim objection, including as it pertains
20 to Dr. Seal since he was involved individually and in his capacity
21 for the entities.

22 c. My firm was charged with much of the document management
23 and court filings, including repeated filings that were redacted
24 and sealed both within the brief and among the exhibits. This
25 included both our own filings and filing by opposing parties,
26 which also were often filed under seal or with redaction. My
27 office also was involved in preparation of documents for the
28 evidentiary hearings as well as the record used in the appeal.

1 Again, these triggered issues for sealing or redacting documents
2 from the public record due to the protective order I often was
3 personally involved to discuss and attempt to resolve issues with
4 opposing counsel on evidentiary issues and legal points.

5 d. I also was personally involved in the legal research and drafting
6 of the appellate briefs and preparation for oral argument before
7 the U.S. Bankruptcy Appellate Panel.

8 e. I attended and participated in all hearings related to the
9 Objections, including the three-day evidentiary hearing and the
10 appellate hearing.

11 7. Attached hereto as **Exhibit 1** is a demonstrative table reflecting the
12 professionals in my firm that worked on this matter, their billing rates, the amount
13 they worked per month, and the totals per timekeeper and overall. The work related
14 to GLA's Objections was done in 2021 and 2022. My hourly rate in those years was
15 \$435 and \$460, respectively. My then-associate, Joseph Dagher, billed at an hourly
16 rate of \$275 in 2021. Paralegal Merrilyn Marsh's rate was \$210 per hour in 2021.
17 She retired at the end of the year, and paralegal Courtney Droessler billed at the rate
18 of \$195 per hour in 2022.

19 8. **My firm worked 279.7 hours on the Objections for a total of**
20 **\$103,551 in fees.** The blended rate was \$347.84 per hour for the work done by my
21 associate, my paralegals, and me. GLA has paid in full all of its invoices from my
22 firm, including all the work by my firm detailed here on the Objections.

23 9. Exhibit 1 also contains copies of actual invoices our firm sent to GLA
24 and used in preparing the table. The invoices are highlighted in different colors for
25 each professional to identify the work he or she did on the Objections.

26 10. The original invoices included time for all work relating to the
27 bankruptcy case and GLA's overall dispute with the parties. Some of this work was
28 not directly related to the Objections. Therefore, I have caused to be redacted from

1 the original invoices all time entries that were not directly related to GLA's
2 Objections. Of course, I have also removed the time billed for all but the remaining
3 time entries. For days in which all of the work was directly related to the Objections,
4 the billed hours in the attached invoices are the same as on the original invoices. For
5 days in which some of the work was directly related to GLA's Objections, time
6 entries that were not directly related to GLA's Objections have been redacted, and
7 the hours have been reduced to reflect only time directly related to the Objections.
8 Therefore, the detailed time entries in the attached redacted invoices reflect only
9 time that was directly related to litigating the Objections, and the amounts reflected
10 are only amounts that were directly related to litigating the Objections.

11 11. Based on my level of experience and the complexity of the litigation
12 involving the Objections, I believe the hourly rates set forth above and reflected in
13 the invoices and the number of hours billed are reasonable. I have been practicing
14 law, mostly in Nevada, for 19 years. A large majority of my work has involved
15 business bankruptcy. Based on my own personal knowledge of the billing rates of
16 fellow business bankruptcy attorneys in Nevada, my rate at below \$500 per hour—
17 and the firm's blended rate below \$350 per hour—is well within the rates approved
18 in bankruptcy proceedings for estate expenses in complex commercial disputes.

19 I declare under penalty of perjury under the laws of the United States of
20 America that the foregoing is true and correct.

21 Executed on September 8, 2023, at Reno, Nevada.

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Louis M. Bubala III

CERTIFICATE OF SERVICE

Pursuant to FRBP 7005 and FRCP 5(b), I certify that I am employee of
KAEMPFER CROWELL, that I am over the age of 18 and not a party to the above-
referenced case, and that on September 8, 2023 I filed and served the foregoing
**DECLARATION OF LOUIS M. BUBALA III IN SUPPORT OF CREDITOR
GEO-LOGIC ASSOCIATES, INC.'S MOTION TO ALLOW GLA'S
ADMINISTRATIVE EXPENSES INCURRED OBJECTING TO
DIFFERENTIAL ENGINEERING, INC.'S CLAIMS** as indicated below:

X **BY NOTICE OF ELECTRONIC FILING:** Under Local Rule 5005 of the
United States Bankruptcy Court for the District of Nevada, the above-
referenced document was electronically filed on the date hereof and served
through Notice of Electronic Case Filing System, automatically generated by
that Court's facilities.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: September 8, 2023

/s/ Louis M. Bubala III
An Employee of
KAEMPFER CROWELL

EXHIBIT 1

EXHIBIT 1

Date: September 8, 2023

File: 18014.1

Summary of Invoices by Timekeeper in support of Client's Motion for Administrative Expenses

Invoice	Date	Timekeeper	Rate	Hours	Amount
195830	03/01/2021 – 03/31/2021	Louis M. Bubala	\$435.00 / hr.	0.50	\$217.50
196761	04/01/2021 – 04/30/2021	Louis M. Bubala	\$435.00 / hr.	13.3	\$5,785.50
197682	05/01/2021 – 05/31/2021	Louis M. Bubala	\$435.00 / hr.	14.1	\$6,133.50
201348	06/1/2021 – 06/30/2021	Louis M. Bubala	\$435.00 / hr.	26.1	\$11,353.5
203536	07/1/2021 – 07/31/2021	Louis M. Bubala	\$435.00 / hr.	12.2	\$5,307.00
205036	08/01/2021 – 08/31/2021	Louis M. Bubala	\$435.00 / hr.	23.8	\$10,354.00
206861	09/01/2021 – 09/30/2021	Louis M. Bubala	\$435.00 / hr.	6.9	\$3,001.50
208321	10/1/2021 – 10/31/2021	Louis M. Bubala	\$435.00 / hr.	21.2	\$9,222.00
209974	11/1/2021 – 11/30/2021	Louis M. Bubala	\$435.00 / hr.	33.7	\$14,659.50
211309	12/1/2021 – 12/31/2021	Louis M. Bubala	\$435.00 / hr.	2.1	\$913.50
213800	01/1/2022 – 01/31/2022	Louis M. Bubala	\$460.00 / hr.	2.40	\$1,104.00
217652	03/2/2022 – 03/31/2022	Louis M. Bubala	\$460.00 / hr.	0.1	\$46.00
219925	04/01/2022 – 04/30/2022	Louis M. Bubala	\$460.00 / hr.	3.3	\$1,518.00
222187	05/01/2022 – 05/31/2022	Louis M. Bubala	\$460.00 / hr.	13.8	\$6,348.00
223599	06/01/2022 – 06/30/2022	Louis M. Bubala	\$460.00 / hr.	0.7	\$322.00
227477	07/01/2022 – 08/31/2022	Louis M. Bubala	\$460.00 / hr.	11.9	\$5,474.00
228953	09/01/2022 – 09/30/2022	Louis M. Bubala	\$460.00 / hr.	7.2	\$3,312.00
230093	10/01/2022 – 10/31/2022	Louis M. Bubala	\$460.00 / hr.	0.1	\$46.00
	Sub-Total	Louis M. Bubala		193.4	\$85,117.50
203536	07/1/2021 – 07/31/2021	Joseph Dagher	\$275.00 / hr.	6.2	\$1,705.00
205036	08/01/2021 – 08/31/2021	Joseph Dagher	\$275.00 / hr.	1.6	\$440.00
	Sub-Total	Joseph Dagher		7.8	\$2,145.00
196761	04/01/2021 – 04/30/2021	Merrilyn Marsh	\$210.00 / hr.	0.2	\$42.00
197682	05/01/2021 – 05/31/2021	Merrilyn Marsh	\$210.00 / hr.	0.3	\$63.00
201348	06/1/2021 – 06/30/2021	Merrilyn Marsh	\$210.00 / hr.	14.7	\$3,087.00
203536	07/1/2021 – 07/31/2021	Merrilyn Marsh	\$210.00 / hr.	5.0	\$1,050.00
205036	08/01/2021 – 08/31/2021	Merrilyn Marsh	\$210.00 / hr.	11	\$2,310.00
206861	09/01/2021 – 09/30/2021	Merrilyn Marsh	\$210.00 / hr.	1.7	\$357.00
208321	10/1/2021 – 10/31/2021	Merrilyn Marsh	\$210.00 / hr.	9.5	\$1,995.00
209974	11/1/2021 – 11/30/2021	Merrilyn Marsh	\$210.00 / hr.	22.0	\$4,620.00
211309	12/1/2021 – 12/31/2021	Merrilyn Marsh	\$210.00 / hr.	1.0	\$210.00
	Sub-Total	Merrilyn Marsh		65.4	\$13,734.00
217652	30/2/2022 – 03/31/2022	Courtney Droessler	\$195.00 / hr.	0.2	\$39.00
222187	05/01/2022 – 05/31/2022	Courtney Droessler	\$195.00 / hr.	10.0	\$1,950.00
227477	07/01/2022 – 08/31/2022	Courtney Droessler	\$195.00 / hr.	2.9	\$565.50
	Sub-Total	Courtney Droessler		13.1	\$2,554.50
	Totals			279.7	\$103,551.00

KAEMPFER CROWELL

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Page	1
Invoice	195830
Date	04/02/21
Client	18014

INVOICE SUMMARY

For professional services rendered and expenses through MARCH 31, 2021 :

Professional Services
Total Disbursements

██████████
██████████

TOTAL THIS INVOICE

██████████

PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
3/08/21	LMB	202-10 Emails with Ron Oines re options for prosecution of claims, depositions of parties before litigation, and draft objection to Differential claims.	.20	87.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[illegible]

Page	4
Invoice	195830
Date	04/02/21
Client	18014
Matter	1/LMB

Date	Atty	Description	Hours	Amount
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]		
		TOTAL HOURS	[REDACTED]	
		TOTAL PROFESSIONAL SERVICES		[REDACTED]

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Amount
Bubala, Louis M	[REDACTED]	435.00	[REDACTED]
Tackes, Steven E	[REDACTED]	499.00	[REDACTED]
TOTAL	[REDACTED]		[REDACTED]

MATTER TOTAL

INVOICE TOTAL

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KAEMPFER CROWELL

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Page	1
Invoice	196761
Date	05/04/21
Client	18014

INVOICE SUMMARY

For professional services rendered and expenses through APRIL 30, 2021 :

Professional Services
Total Disbursements

[REDACTED]
[REDACTED]

TOTAL THIS INVOICE

[REDACTED]

PROFESSIONAL SERVICES

[illegible]

[illegible]

Page 4
 Invoice 196761
 Date 05/04/21
 Client 18014
 Matter 1/LMB

Date	Atty	Description	Hours	Amount
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
4/15/21	LMB	137-215, +.1 Review & revise proposed claim objection; telephone call with trustee's counsel Mike Lehnert on same; emails with Ron Oines on same.	.80	348.00
		[REDACTED]		
4/15/21	LMB	410-30, 529-40 Telephone call with trustee's counsel Mike Lehnert re claims, claim objections, security interests, and discovery/debtor's records; email with Ron Oines on same.	.60	261.00
		[REDACTED]		
4/19/21	LMB	115-218 Review & develop strategy to address objection to Differential claims; emails with Ron Oines on same.	1.00	435.00
		[REDACTED]		
4/20/21	LMB	Emails with Ron Oines re details of claim objection for disallowance and subordination.	.10	43.50
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
4/21/21	LMB	354-419 Review & revise amended objection to Differential proofs of claim.	.50	217.50
		[REDACTED]		
4/21/21	LMB	459-501 Followup with Ron Oines re evaluation of updated objection to Differential claims.	.10	43.50
		[REDACTED]		
		[REDACTED]		

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Invoice	196761
Date	05/04/21
Client	18014
Matter	1/LMB

Date	Atty	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4/28/21	LMB	113-330, 400-605 Legal research on objection to Differential claims regarding subordination of non-equity claims of equity members, novation, and statute of limitations on claims in bankruptcy.	4.00	1,740.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4/29/21	LMB	117-220, 233-312 Legal research re novation between Differential's contracts and its notes with MRS.	2.70	1,174.50
4/29/21	LMB	340-426 Evaluate claims and agreements for arguments on novation and statute of limitations.	.80	348.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4/30/21	LMB	422-450, 548-600, 821-54 Additional research & drafting arguments re novation and executory accord on Differential claims with promissory notes.	1.50	652.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4/30/21	LMB	Continue drafting argument on novation between	1.10	478.50

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Invoice	196761
Date	05/04/21
Client	18014
Matter	1/LMB

Date	Atty	Description	Hours	Amount
4/30/21	MHM	Differential claims and promissory notes. Respond to Bubala request to forward document identifying evidence and move supporting exhibits to client iManage file.	.20	42.00

TOTAL HOURS

TOTAL PROFESSIONAL SERVICES

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Amount
Bubala, Louis M		435.00	
Marsh, Merrilyn		210.00	
TOTAL			

MATTER TOTAL

INVOICE TOTAL

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KAEMPFER CROWELL

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Page	1
Invoice	197682
Date	06/02/21
Client	18014

INVOICE SUMMARY

For professional services rendered and expenses through MAY 21, 2021 :

Professional Services
Total Disbursements

TOTAL THIS INVOICE



Page	2
Invoice	197682
Date	06/02/21
Client	18014
Matter	1/LMB

Re: Metal Recovery Solutions

PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
5/05/21	LMB	217-20 Emails with Ron Oines & Edson McClellan re additional evaluation of Differential claim.	.10	43.50
5/06/21	LMB	205-630 Review & revise objection to Differential claims, review supporting evidence & email with Ron Oines on same.	4.50	1,957.50
5/06/21	MHM	Review opening paragraphs of Differential claim objection and conf with Lou Bubala re same.	.30	63.00
5/07/21	LMB	947-1057, 1118-123, 1245-250 Additional factual & legal research on objection to proof of claim, and revisions to objection; emails with Ron Oines & review additional documents.	5.00	2,175.00
5/14/21	LMB	Telephone call with Ron Oines re revisions to objection to claims of Differential Engineering.	.10	43.50
5/20/21	LMB	240-437 Revise objection to Differnetial claims and email with Ron Oines on same.	2.00	870.00
5/21/21	LMB	150-412 Update objection to DEI claims.	2.40	1,044.00
TOTAL HOURS			[REDACTED]	
TOTAL PROFESSIONAL SERVICES				[REDACTED]

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Amount
Bubala, Louis M	[REDACTED]	435.00	[REDACTED]
Marsh, Merrilyn	[REDACTED]	210.00	[REDACTED]
TOTAL	[REDACTED]		[REDACTED]

MATTER TOTAL

[REDACTED]

Page	3
Invoice	197682
Date	06/02/21
Client	18014
Matter	1/LMB

INVOICE TOTAL


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KAEMPFER

CROWELL

July 15, 2021

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 201348
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: June 30, 2021

RE: Metal Recovery Solutions

Professional Services
Costs Advanced

[REDACTED]

TOTAL THIS INVOICE

[REDACTED]

KAEMPFER CROWELL

July 15, 2021

Invoice No. 201348

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
6/11/21	LMB	Updated revisions on facts & law to claim objection; email with Ron Oines on same.	5.60	2,436.00
6/14/21	LMB	Continue revisions to claim objection.	.70	304.50
6/14/21	LMB	Emails with Ron Oines re revisions to claim objections; complete revisions; direct paralegal Marilyn Marsh on additional points for rules on claim objections and documents.	1.70	739.50
6/14/21	MHM	Review GLA objection to claim of Differential Eng, note revisions and additional exhibits, compliance w/B.R. 3007 for omnibus objection (2.3); review revisions and identifying as omnibus objection with Lou Bubala and compile revised exhibits reflecting inclusion of claims subject to objection (Ex. 1) and elimination of page numbering for new exhibits 2-10 (2.8); revise Bubala declaration in support of omnibus objection (.9); revise and verify accuracy of exhibit citations in objection to claim -- revise exhibits, citation to reflect addition of proofs of claims, revisions to pin citations to evidentiary documents/exhibits (1.8)	7.80	1,638.00
6/15/21	LMB	Review exhibits and citations for objection to Differential claims and motion to seal documents.	.20	87.00
6/15/21	MHM	Draft/send email to Lou Bubala re status of Differential claim objection (.1); work on drafting motion to file under seal, draft order granting motion to seal (1.0); final review and revisions to Differential claim objection--mark confidential exhibit references for possible redaction(s), create slip-sheets for confidential exhibits for the redacted, public version of the claim objection (1.3).	2.30	483.00
6/16/21	LMB	Finalize claim objection.	.20	87.00
6/16/21	LMB	Continue revisions to claim objections & preparation of exhibits.	1.90	826.50
6/17/21	LMB	Revisions to claim objections and exhibits.	3.10	1,348.50
6/18/21	LMB	Finalize claim objections and exhibits.	7.30	3,175.50
6/18/21	MHM	Review and revise objection to claims of Differential Engineering (2.1); work on preparing exhibits in final form, redactions to confidential materials, filing under seal, finalize redacted and confidential versions of the objection and exhibits, declaration, and motion to seal and file same with the court (2.0)	3.10	651.00
6/21/21	LMB	Review rules for sealing documents & filing with court in regards to claim objection on Differential.	.20	87.00
6/21/21	LMB	Telephone call with trustee counsel Mike Lehnars re claim objection and litigation against Seals; request hearing date for claim objection from court; update Ron Oines.	.40	174.00
6/21/21	MHM	Work on review of local rules to comply with submitting confidential version of Differential's claim objection, revise order granting motion to seal, and cover page for envelope to chambers and compliance with LR 9018.	.80	168.00

Invoice No. 201348

3

KAEMPFER CROWELL

July 15, 2021

Invoice No. 201348

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		435.00	
Marsh, Merrillyn		210.00	
Total			

TOTAL THIS INVOICE**Interest at the rate of 1.5% per month will be charged on any past due invoices.**

KAEMPFER

CROWELL

August 6, 2021

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 203536
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: July 31, 2021

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

KAEMPFER CROWELL

August 6, 2021

Invoice No. 203536

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/01/21	LMB	Prepare proposal for briefing, discovery and evidentiary hearing/argument on claim objection to Differential; emails with party counsel on same.	.40	174.00
7/02/21	LMB	Followup with Ron Oines and paralegal Merrily Marsh re depositions in claim objection and topics for person most knowledgeable on issues for Differential; telephone message for Differential counsel Seth Adams to schedule depositions.	.20	87.00
7/02/21	LMB	Emails with Ron Oines re scope of discovery in contested matter on Differential claims.	.10	43.50
7/05/21	JED	Legal research regarding claim preclusion involving proof of claim objections and adversary proceedings for security interests; exchange emails with Lou Bubala re same.	2.80	770.00
7/05/21	LMB	Review research on collateral estoppel for claim objection as to amount of debt and adversary proceeding contesting security interest; email with associate Joe Dagher on same.	.20	87.00
7/06/21	LMB	Followup research with Joe Dagher on collateral estoppel for claim objection as to amount of debt and adversary proceeding contesting security interest.	.10	43.50
7/07/21	LMB	Emails with Seal counsel Cissy Lee and Differential counsel Seth Adams and with Ron Oines re objections to additional discovery and scheduling of claim objection; contact court clerk about rescheduling options.	.30	130.50
7/07/21	LMB	Telephone calls & emails with court clerk David Lindersmith, with Differential counsel Seth Adams, and with Ron Oines re scheduling, briefing and discovery on Differential claim objections.	.50	217.50
7/07/21	MHM	Draft/send request to court seeking later date for claim objection hearing based on S. Adam's inability to attend 7/30 hearing; review email setting for 8/18 (.2); draft stipulation continuing hearing on Differential claim objection (.5)	.70	147.00
7/08/21	JED	Legal research regarding deposition notice/subpoena requirements for creditors/debtors; exchange email with Lou Bubala and Merrilyn Marsh re same.	.80	220.00
7/08/21	LMB	Direct requirements to notice depositions of persons most knowledgeable for Differential and debtor as part of contested matter of claim dispute.	.40	174.00
7/08/21	MHM	Revise stipulation and order resetting hearing date on Differential claim objection; finalize and draft/send email to Seth Adams requesting review and approval of same (.5); conf with Lou re deposition notices and topics to be identified in depo notices (.2).	.70	147.00
7/09/21	LMB	Followup research with associate Joe Dagher re service requirements for depositions of Differential and debtor in claim objection.	.20	87.00
7/09/21	LMB	Emails with Differential counsel Seth Adams approving proposed stipulation to reschedule claim objection hearings.	.10	43.50
7/09/21	LMB	Additional legal research re notice and subpoena requirements for deposition in contested claim objection.	.40	174.00

KAEMPFER CROWELL

August 6, 2021

Invoice No. 203536

Date	Init	Description	Hours	Amount
7/09/21	MHM	Put stipulation and order in final format, submit stip for filing with court and lodge order approving (.2); draft notice of depositions for PMK of debtor and Differential (.4).	.60	126.00
7/12/21	MHM	Revise deposition notice for Differential; draft depo notice for debtor; draft emails to Lou seeking info on topics, duration and location of depositions.	1.50	315.00
7/13/21	LMB	Update deposition notices for Differential and Metal Recovery of objection to claims of Differential; telephone call & email with paralegal Marilyn Marsh on same.	.50	217.50
7/13/21	MHM	Tele conf (x2) with Lou Bubala re deposition notices, revise and finalize notice of depositions of PMK Differential Eng and PMK Debtor, work with assistant with personal service and scheduling court reporter. File notices with USBC via CM/ECF.	1.20	252.00
7/19/21	LMB	Followup on research to compel attendance at depositions of claimant and debtor as part of contested claim objection.	.10	43.50
7/21/21	LMB	Emails with Ron Oines re status of depositions scheduled for objections to claims of Differential Engineering and potential video appearances for depositions.	.10	43.50
7/21/21	LMB	Emails with Seals counsel Cissy Lee & Differential counsel Seth Adams re objections to their depositions on claim objections; telephone call with trustee counsel Mike Lehnert; emails with Ron Oines and associate Joe Dagher re evaluation of Seals prior arguments under Rule 3007 on discovery in contested matters.	1.00	435.00
7/22/21	JED	Legal research regarding interpretation of LR 3007(c) as it pertains to conducting discovery pending claim objections; exchange emails with Lou Bubala re same.	2.60	715.00
7/22/21	LMB	Emails with Ron Oines & research regarding right to conduct discovery in contested matter on Differential claim objections, and strategy to address court regarding our right and time to conduct depositions of MRS/Differential in light of objections from Differential and Seals.	.40	174.00
7/22/21	LMB	Emails with Ron Oines, with Differential counsel Seth Adams & Seal counsel Cissy Lee re scheduling of depositions; email court clerk on discovery dispute call.	2.00	870.00
7/22/21	LMB	Further legal evaluation of rights to take discovery in contested matter upon filing of motion; email with Ron Oines on same.	.30	130.50

KAEMPFER CROWELL

August 6, 2021

Invoice No. 203536

Date	Init	Description	Hours	Amount
7/26/21	LMB	Review Differential's motion to quash or for protective order; emails & telephone calls with Ron Oines & Roger Friedman, and with courtroom deputy Illumnida Starzyk, and with party counsel on claim objection; research re standing issues raised by Differential.	2.20	957.00
7/26/21	LMB	Emails with Roger Friedman re issues with Differential and debtor depositions as part of claim objection.	.20	87.00
7/26/21	LMB	Additional emails with Ron Oines and courtroom deputy Illuminada Starzyk re discovery dispute call with Judge Beesley.	.10	43.50
7/26/21	LMB	Emails with Ron Oines re trustee's evaluation of claim objection and adversary proceeding, discovery, and security interest in patent.	.30	130.50
7/26/21	MHM	Review motion to quash filed by Differential Engineering, conference with Lou Bubala re 7/28 depositions and need to cancel court reporter per filing, conference with assistant asking to cancel court reporter and room reservation for depositions noticed for PMK for Debtor Metal and Creditor Differential.	.30	63.00
7/27/21	LMB	Coordinate response to parties on depositions; prepare & file amended notice of depositions; emails with Ron Oines & Roger Friedman on same.	.50	217.50
7/28/21	LMB	Emails with trustee's counsel Mike Lehnern and with Ron Oines re scheduling of depositions based on schedules of counsel for trustee and Differential, and potential chance in hearing date with new assigned judge.	.20	87.00
7/29/21	LMB	Emails with Differential counsel Seth Adams and Kelsey Gunderson re hearing on motion for protective order; emails with Ron Oines and Roger Friedman on same.	.50	217.50
7/29/21	LMB	Emails & call with deputy court clerks Illuminada Starzyk and Benji Rawlings re scheduling of hearings with Judge Spraker.	.30	130.50
7/30/21	LMB	Followup on status of potential request to hear motion for protective order on shortened time.	.10	43.50
7/30/21	LMB	Telephone call with trustee's counsel Mike Lehnern re right to pursue Differential claim objections and depositions.	.20	87.00
7/30/21	LMB	Emails with deputy court clerk Benji Rawlings and party counsel re rescheduling hearing on objection to Differential claims based on reassignment of case.	.30	130.50
TOTAL PROFESSIONAL SERVICES				\$ 8,645.50

KAEMPFER CROWELL

August 6, 2021

Invoice No. 203536

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		435.00	
Dagher, Joseph		275.00	
Marsh, Marilyn		210.00	
Total			

TOTAL THIS INVOICE

KAEMPFER CROWELL

August 6, 2021

Invoice No. 203536

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
201348	7/15/21			
	PREVIOUS BALANCE			
	Balance Due This Invoice			—
	TOTAL BALANCE DUE			=

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

September 3, 2021

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 205036
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: August 31, 2021

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

Invoice No. 205036

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
8/01/21	LMB	Email with Differential counsel Shay Wells re rescheduling of depositions for claim objection.	.10	43.50
8/02/21	LMB	Review order shortening time for hearing on motion to quash/protective order; emails with Ron Oines on briefing and depositions; email with opposing counsel about same.	.30	130.50
8/02/21	LMB	Initial evaluation of rule regarding consent to entry of final order by bankruptcy judge on claim objection.	.10	43.50
8/03/21	LMB	Evaluate issues of consent to entry of final order by bankruptcy court on objection to Differential claims; direct associate Joe Dagher to followup on same.	.30	130.50
8/03/21	LMB	Emails with party counsel re rescheduling Differential and Debtor depositions in response to objection to Differential claims.	.10	43.50
8/03/21	MHM	Review 8/4 upcoming deadline re final decision by court, identify authority for deadline in local rules, review same with Lou Bubala; review upcoming deadline on response to Differential claim objection and direct assistant to adjust due dates based on reset hearing before Judge Spraker.	.30	63.00
8/04/21	LMB	Review Differential's motion for protective order & order shortening time for hearing on same, and prepare strategy for response; email with Ron Oines on same.	.30	130.50
8/05/21	LMB	Prepare amended notices of depositions for Differential claim objections.	.10	43.50
8/05/21	MHM	Draft 2nd amended notices of depositions for 30-b-6 for Metal Recovery and Differential; file with the court and notify court reporter of date change.	.50	105.00
8/10/21	LMB	Email with Ron Oines re status of trustee's declaration authorizing prosecution of claim objections.	.10	43.50
8/10/21	LMB	Review & revise draft response to motion to quash subpoenas on Differential claim objections; telephone call with trustee's counsel Mike Lehnern on authorization and email with Ron Oines on same.	.50	217.50
8/12/21	LMB	Research & revise response to motion to quash; emails & calls with trustee's counsel Mike Lehnern re authorization to prosecute claim objections; emails with Ron Oines & Roger Friedman on same.	5.50	2,392.50
8/12/21	MHM	Review latest version of opposition to motion to quash, and work on drafting Lehnerns declaration in support of opposition to Differential's motion to quash; draft/send email to Mike Lehnerns requesting timely review and response.	1.20	252.00
8/13/21	LMB	Revise & file opposition to motion to quash notices of depositions regarding objection to Differential claims; call with Ron Oines on same; emails with trustee's counsel Mike Lehnerns regarding supporting declaration.	2.40	1,044.00

KAEMPFER CROWELL

September 3, 2021

Invoice No. 205036

Date	Init	Description	Hours	Amount
8/13/21	MHM	Review and revise opposition to motion to quash subpoenas (.8); receive executed declaration of M. Lehnern, prepare in final for filing with opposition (.1).	.90	189.00
8/16/21	LMB	Review & summarize arguments to address Differential reply in support of its motion to quash.	.40	174.00
8/17/21	LMB	Prepare for & call/emails with Ron Oines for hearing on motion to quash depositions for Differential claim objections; participate in hearing; calls/emails after the hearing with trustee's counsel Mike Lehnern and Ron Oines.	4.50	1,957.50
8/17/21	MHM	Conference with Lou re outcome of hearing on motion to quash (.1); draft notice of vacated depositions, vacating 8/24 depos--finalize and submit/file with the court (.8); draft/send email to court reporter vacating depositions--follow-up re scheduling (.1).	1.00	210.00
8/18/21	LMB	Telephone call with Differential counsel Seth Adams re standing to object to claim and response to claim objection; email with Ron Oines on same.	.50	217.50
8/18/21	LMB	Draft and revise stipulation on claim objections and court authorization; emails with Ron Oines on same and evaluation of scope of standing on claim objections based on discussion with Differential counsel Seth Adams.	1.00	435.00
8/19/21	LMB	Review & revise stipulation related to authorization to prosecute claim objection; emails with Ron Oines, Differential counsel Seth Adams & Kelsey Gunderson, and trustee counsel Mike Lehnern.	.40	174.00
8/19/21	LMB	Additional emails with Differential counsel Seth Adams, trustee counsel Mike Lehnern and with Ron Oines re stipulation on authority to prosecute claim objections; direct Marilyn Marsh re changes and submission with proposed order.	.10	43.50
8/19/21	MHM	Review and finalize stipulation with Differential re standing to assert objection to claim, draft order approving stipulation, place stip and order in final form, file stipulation with Court and lodge order approving.	.90	189.00
8/25/21	MHM	Review Differential's response to claim objection, declaration of Thom Seal, research USPTO office for proof of a patent in the name of either Seal or Differential (none, but found copyright for Differential).	.90	189.00
8/30/21	JED	Legal research regarding consenting to entry of a final order by a bankruptcy court; exchange email with Lou Bubala re same.	1.60	440.00
8/30/21	LMB	Review Differential opposition to GLA claim objection and proposed reply in support of objections; revise & circulate for consideration and preparation for exhibits.	2.00	870.00
8/30/21	LMB	Review & revise research from Joe Dagher on bankruptcy local rule requiring parties to report whether they consent to entry of final order by bankruptcy judge on contested claim objection; emails with Ron Oines and Roger Friedman on same.	.90	391.50
8/30/21	LMB	Telephone calls & emails with Ron Oines & Roger Friedman re post-work notes filed with Differential claims, validity of notes and prior work, and potential fraudulent transfers.	.40	174.00

KAEMPFER CROWELL

September 3, 2021

Invoice No. 205036

Date	Init	Description	Hours	Amount
8/30/21	LMB	Legal research on claims based on purported underlying work and new promissory notes as a novation.	1.10	478.50
8/30/21	LMB	Final revision of reply in support of claim objection.	1.70	739.50
8/30/21	MHM	Review and revise reply memorandum in support of Differential claim objection (1.3); identify, gather, download and prepare supporting exhibits for filing (1.0); draft declaration of Lou Bubala (.8);	3.20	672.00
8/31/21	LMB	Prepare additional points on basis of debt versus subsequent notes for reply in support of Differential claim objection.	1.00	435.00
8/31/21	MHM	Final review of reply brief in support of Differential claim objection, identify and prepare additional exhibits cited, update exhibit list, final review of Bubala declaration, prepare brief, exhibits and declaration in final form for filing with the court., correct file error requiring flattening of document and exhibits for upload (1.9); file reply and declaration w/court (.2).	2.10	441.00

TOTAL PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Hours	Rate	Total
Bubala, Louis M		435.00	
Dagher, Joseph		275.00	
Marsh, Merrillyn		210.00	
Total			

TOTAL THIS INVOICE

KAEMPFER CROWELL

September 3, 2021

Invoice No. 205036

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
203536	8/06/21			
	PREVIOUS BALANCE			
	Balance Due This Invoice			
	TOTAL BALANCE DUE			

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

October 4, 2021

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 206861
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: September 30, 2021

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

Invoice No. 206861

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
9/03/21	LMB	Prepare for oral argument on objection to Differential claims; telephone call with Ron Oines on same.	.80	348.00
9/07/21	LMB	Prepare for & participate on hearings on Objection to Differential claims and Motion to Quash subpoenas.	2.20	957.00
9/07/21	LMB	Coordinated new depositions of representatives of Differential and MRS.	.10	43.50
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
9/10/21	LMB	Review scheduling order on objection to Differential claims & direct staff to followup with court clerk on filing documents under deal per terms of order.	.10	43.50
9/10/21	LMB	Telephone call with trustee's counsel Mike Lehnern re depositions and questions of MRS and Differential representatives.	.30	130.50
9/[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
9/13/21	MHM	Review Spraker order concerning evidentiary hearing on Differential claim objections, draft status report and draft/send via email to Lou for review and input.	.60	126.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
9/15/21	LMB	Follow up with Seth Adams and with Ron Oines re depositions of debtor and Differential on claim objections, and on issues for adversary complaint.	.20	87.00
9/16/21	MHM	Review order concerning the 11/15 evidentiary hearing and marking exhibits and procedure for submitting confidential exhibits under seal; download court-required Exhibit log and complete with exhibits included with claim objections, review order with Lou re additional exhibits for hearing (unknown but expected) (.8); draft/send email to Judge Spraker's courtroom deputy regarding procedures (.1); resend and revise email to court, including Seth Adams (.2).	1.10	231.00
9/17/21	LMB	Emails & calls with Differential counsel Seth Adams and with Ron Oines re scheduling of depositions on claim objection.	1.00	435.00

KAEMPFER CROWELL

October 4, 2021

Invoice No. 206861

Date	Init	Description	Hours	Amount
9/20/21	LMB	Followup with Differential counsel Seth Adams, with Ron Oines, and courtroom deputy Benji Rawlings re deposition schedules.	.20	87.00
9/20/21	LMB	Review & revise deposition notices for MRS and Differential in claim objections; emails with Ron Oines on same.	.20	87.00
9/21/21	LMB	Coordinate audio from claim objection hearing to review Seth Adams' representations.	.30	130.50
9/21/21	LMB	Additional emails with Ron Oines and with Differential counsel Seth Adams re scheduling of depositions on claim objections.	.20	87.00
9/22/21	LMB	Outline issues for deposition, briefing and evidentiary hearings; email with Ron Oines on same.	1.00	435.00
9/30/21	LMB	Followup with Ron Oines on preparation and exhibits for Differential/Debtor depositions.	.10	43.50
9/30/21	LMB	Emails with trustee & trustee's counsel re substitution of counsel for debtor, role of debtor's counsel & trustee's counsel in depositions, and potential issues for depositions.	.20	87.00
TOTAL PROFESSIONAL SERVICES				

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		435.00	
Marsh, Merrilyn		210.00	
Total			

TOTAL THIS INVOICE

KAEMPFER CROWELL

October 4, 2021

Invoice No. 206861

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
205036	9/03/21			
	PREVIOUS BALANCE			
	Balance Due This Invoice			
	TOTAL BALANCE DUE			

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

November 4, 2021

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 208321
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: October 31, 2021

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

Invoice No. 208321

Date	Init	Description	Hours	Amount
10/01/21	LMB	Telephone call with Mike Lehnerns re Seal deposition; email with Ron Oines on same.	.60	261.00
10/04/21	LMB	Emails & calls with Ron Oines and with trustee's counsel Mike Lehnerns re deposition of Thom Seal.	.50	217.50
10/05/21	LMB	Review 10/4/21 deposition transcript of Thom Seal.	.60	261.00
10/06/21	LMB	Telephone call with Ron Oines to develop strategy for supplemental brief on objection to Differential claims following depositions.	.60	261.00
10/08/21	LMB	Followup with court reporter on Seal deposition transcription.	.10	43.50
10/08/21	LMB	Telephone call with trustee's attorney re evaluation of Thom Seal testimony and objection to claims of Differential.	.30	130.50
10/11/21	LMB	Initial markup of 10/4/21 & 10/5/21 Seal MRS/Differential transcripts and exhibits for support to objection to Differential claims; review notes from Ron Oines; begin drafting supplement on claim objections.	5.20	2,262.00
10/11/21	MHM	Revise depo exhibits 1-26 from 10/4 deposition of Thom Seal and save to client file (.7); download 10/5 transcript of Seal and exhibits 27-37 and save to client file (.5); review settlement conference order entered 10/4, download/save to client file and communicate with Lou and assistant re calendaring deadlines in order (.4); respond to email request from M. Lehnerns requesting 2015 tax return for MRS--locate and forward return to Mr. Lehnerns--save 2016-2018 tax returns marked as exhibits for Seal depo to tax file (.2).	1.80	378.00
10/12/21	LMB	Research and draft supplemental brief on objection to Differential claims.	6.40	2,784.00
10/12/21	MHM	Prepare Seal deposition transcripts and exhibits 1-37 for filing with the court (under seal), and prepare confidential/publc version of the same (1.0); tele conf with L. Bubala re filing under seal (.1); draft motion to file under seal and order granting motion, file public version of notice of filing depo transcripts and exhibits, motion to seal and lodge order with the court (1.8); draft/send email to court clerk Benji re submitting confidential versions of depo transcripts (.2).	3.10	651.00

KAEMPFER CROWELL

November 4, 2021

Invoice No. 208321

Date	Init	Description	Hours	Amount
10/13/21	LMB	Coordinate submission of transcripts to court under seal & circulation of copies to opposing counsel.	.20	87.00
10/13/21	MHM	Work on submitting confidential court filing of Thom Seal deposition transcripts and exhibits, review email from Benji Rawlings, contact Illuminada in Reno office and forward confidential documents as well as serve all counsel with the confidential versions of the transcripts and exhibits.	1.70	357.00
10/13/21	MHM	Work on transmitting confidential deposition transcripts and exhibits to attorneys w/Humphrey Law, including tele conf with Ed Humphrey. Resolve issues with rejection of emails and need to reduce file sizes.	.50	105.00
10/22/21	LMB	Review trustee's response as to objections to Differential claims.	.10	43.50
10/25/21	LMB	Emails with Ron Oines re reply brief on Differential claims on novation arguments and brief length.	.40	174.00
10/25/21	LMB	Emails with Ron Oines re exhibits for supplemental reply in support of objection to Differential claims; initial review & response on same.	.50	217.50
10/25/21	MHM	Review and respond to email from Lou Bubala re filing depo transcripts of Thom Seal with the court, research communications and court filings to verify transcripts filed under seal, forwarded to court clerk for delivery to Judge Spraker, respond with details (.2); review and respond to email communications from Ron Oines re procedure for exhibits to be admitted at the 11/15 hearing on Differential's claim objections, forward court clerk's communications (.2).	.40	84.00
10/26/21	LMB	Finalize supplemental reply on objection to Differential claims with exhibits and filing under seal.	3.50	1,522.50
10/27/21	LMB	Emails with Ron Oines and Merrilyn Marsh re preparation of exhibits for hearing on objection to Differential claims; review local forms & rules.	.20	87.00
10/27/21	LMB	Emails with Ron Oines & research on exhibits for evidentiary hearing on objection to Differential claims.	.40	174.00
10/27/21	MHM	Receive, review and respond to emails from Oines re questions on hearing exhibits, review L.R. 9017 and order, set meeting to confer.	.50	105.00

KAEMPFER CROWELL

November 4, 2021

Invoice No. 208321

Date	Init	Description	Hours	Amount
10/28/21	LMB	Telephone call with Ron Oines and Marilyn Marsh re exhibits and testimony for hearing on objection to Differential claims; email with Differential counsel Seth Adams re service of trial subpoena on Thom Seal.	.70	304.50
10/28/21	LMB	Emails with Differential counsel Seth Adams re trial subpoena for Thomas Seal; revise proposed subpoena & request witness fee; arrange for service; prepare & file notice of issuance of subpoena.	.80	348.00
10/28/21	LMB	Followup on marking exhibits for evidentiary hearing on objection to Differential claims re bates stamps to be applied to exhibits; email with Ron Oines on same.	.10	43.50
10/28/21	MHM	Conference call with co-counsel Ron Oines, Lou and Ceci re preparing evidentiary exhibits for submission to the court per LR 9017 and court's order (.5); draft subpoena, revise and finalize (.5); draft notice of issuance of subpoena, finalize and file with the court (.5).	1.50	315.00

TOTAL PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Hours	Rate	Total
Bubala, Louis M		435.00	
Marsh, Marilyn		210.00	
Total			

COSTS ADVANCED

Date	Description	Amount

TOTAL COSTS ADVANCED**TOTAL THIS INVOICE**

KAEMPFER CROWELL

November 4, 2021

Invoice No. 208321

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
206861	10/04/21			
	PREVIOUS BALANCE			
	Balance Due This Invoice			
	TOTAL BALANCE DUE			

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

December 2, 2021

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 209974
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: November 30, 2021

RE: Metal Recovery Solutions

Professional Services	
Less Discount	
Net Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

KAEMPFER CROWELL

December 2, 2021

Invoice No. 209974

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
11/01/21	LMB	Review & markup proposed exhibit list and testimony designation; email with Differential counsel Seth Adams on same; file designation of testimony.	2.40	1,044.00
11/01/21	LMB	Coordinate service of Seal trial subpoena on Seth Adams.	.10	43.50
11/01/21	MHM	Review trial exhibit list and deposition designation statement, download 1-56 exhibits and review same with Lou Bubala, calls to deputy clerk re filing and transmitting confidential exhibits to Judge Spraker.	.90	189.00
11/02/21	LMB	Meeting with Marilyn Marsh to coordinate bates stamping and submission of exhibits for evidentiary hearing on objection to Differential claims; email with deputy court clerk Illuminada Starzyk on same.	.60	261.00
11/02/21	MHM	Tele conf (x2) with Illuminada, court clerk, re Judge Spraker's preference for exhibits being prepared for evidentiary hearing, email question on bates numbering and review preferences with Lou Bubala (.3); review 56 exhibits and designate confidential vs. public exhibits and bates number each page per judge preference--verify accuracy (2.3)	2.60	546.00
11/03/21	LMB	Legal research & evaluation of potential additions to exhibits for evidentiary hearing on objection to Differential claims; emails with Ron Oines, with Marilyn Marsh, and with Differential counsel Seth Adams & other counsel on same.	1.50	652.50
11/03/21	MHM	Revise exhibit list and add Ex57, Newmont Hydro-Jex technology (1.1); work on identifying documents signed under oath by T. Seal (.7); work on identifying all transcripts and download missing hearing transcripts(.5); download court docket and identify all filings that include Seal's sworn oath (.4); review new Ex58, question inclusion of blank pages and duplication of other exhibits, add pagination for new exhibit (.4); conference with Lou about logistics of filing exhibit list and exhibits on court docket and forwarding confidential exhibits, both to be relied on and viewed by Judge Spraker during hearing (.2).	3.30	693.00
11/04/21	LMB	Emails with Ron Oines & update of exhibit list with financial ledgers; email with opposing counsel Seth Adams & others on the exhibit, additional exhibits, and court procedure for referencing exhibits.	.30	130.50
11/04/21	LMB	Review & update exhibit list, designations as confidential and additions from bankruptcy court filings; email with Ron Oines on arbitration testimony for inclusion in exhibit list for hearing on objection to Differential claims.	1.50	652.50
11/04/21	MHM	Work on responding to emails and revising or preparing exhibits and master exhibit list per directives from Ron Oines and Lou Bubala.	1.50	315.00
11/05/21	LMB	Emails with Marilyn Marsh on updated exhibits to Differential claim objection and circulation of files.	.20	87.00

KAEMPFER CROWELL

December 2, 2021

Invoice No. 209974

Date	Init	Description	Hours	Amount
11/08/21	LMB	Emails with Ron Oines re additional exhibit for hearing on Differential claim objection; email with trustee's counsel Mike Lehnerns re hearing exhibits; meeting with Marilyn Marsh re preparation of exhibits; emails with deputy court clerk Illuminada Starzyk re scheduling of hearing.	.40	174.00
11/08/21	LMB	Telephone call with trustee's counsel Mike Lehnerns re exhibits and questions for evidentiary hearing on Differential claims.	.30	130.50
11/08/21	MHM	Add and prepare confidential Ex. 62, update exhibit list to add Ex. 62; communications with Ceci re filing exhibit list.	.50	105.00
11/09/21	LMB	Emails with Ron Oines and Marilyn Marsh re disclosure and admissibility of exhibits identified for hearing on objection to Differential claims.	.50	217.50
11/09/21	LMB	Emails with Ron Oines and with Differential counsel Seth Adams re additional exhibits and objections to exhibits for hearing on objection to Differential claims.	.30	130.50
11/10/21	LMB	Emails with Differential counsel Seth Adams and with Ron Oines re exhibits for hearing on claim objections; coordinate production with Marilyn Marsh and submit to court.	3.50	1,522.50
11/10/21	MHM	Prepare evidentiary hearing exhibits marked by DEI for filing, both under seal and public versions, revise exhibit list, individually page number all exhibits and generally prepare exhibits as specified by the court, upload final court-filed documents and exhibits (both confidential and public) to sharefile and provide links to Lou Bubala for service to court and parties.	7.90	1,659.00
11/12/21	LMB	Coordinate revisions to exhibit list for recirculation to parties.	.10	43.50
11/12/21	LMB	Emails and calls with Ron Oines, Ceci Solorzano, Marilyn Marsh, court law clerk Angella Yates, Differential counsel Seth Adams and trustee counsel Mike Lehnerns re preparation for hearing on objections to Differential claims.	3.20	1,392.00
11/12/21	LMB	Followup with bankruptcy court on access to filing papers for hearing objection to Differential claims.	.50	217.50
11/12/21	MHM	Revise exhibits 62 and 86 to correct omissions of page numbers (62) and confidential cover page (86).	.30	63.00
11/15/21	LMB	Coordinate filing of exhibits, exhibit list and motion to seal confidential exhibits.	.50	217.50
11/15/21	LMB	Call & email with Ron Oines re exhibits for hearing on objection to Differential claims.	.10	43.50
11/15/21	LMB	Participate in evidentiary hearing on objection to Differential claims.	3.90	1,696.50
11/15/21	LMB	Legal research re admissibility of discussions between Thom Seal and Differential counsel Seth Adams during break from testimony; email with Ron Oines on same.	.80	348.00
11/15/21	MHM	File exhibits with the court, adjusting pdfs as required by PDF annotation errors and size limitations upon upload--two parts each, file exhibit list, motion to seal and lodge order to seal (2.0); create sub folder and save all joint exhibits identified for evidentiary hearing (.4).	2.40	504.00

KAEMPFER CROWELL

December 2, 2021

Invoice No. 209974

Date	Init	Description	Hours	Amount
11/16/21	LMB	Emails with Differential counsel Seth Adams and Ron Oines, and with judicial staff on stipulated admission of exhibits for hearing on claim objection.	.70	304.50
11/16/21	LMB	Participate in second day of evidentiary hearing on objection to Differential claims.	5.30	2,305.50
11/17/21	LMB	Telephone call & email with Ron Oines re transcripts and closing arguments.	.20	87.00
11/17/21	LMB	Telephone call with trustee's counsel Mike Lehnars re depositions and claim objection.	.50	217.50
11/18/21	LMB	Email with Ron Oines re trustee's theories on illusory contract based on Debtor/MRS non-compliance with contract.	.20	87.00
11/18/21	LMB	Evaluation for additional questions to address potential novation.	.40	174.00
11/18/21	LMB	Telephone call with Ron Oines re strategy for final questions and closing on objection to Differential claims.	.20	87.00
11/19/21	LMB	Participate in hearing on Differential claim objection; followup with ordering of transcripts and supplement to designation of deposition transcripts.	4.60	2,001.00
11/22/21	LMB	Coordinate filing of amended deposition excerpts designated for hearing on objection to Differential claims.	.40	174.00
11/22/21	MHM	Review, revise and prepare for filing amended notice of designated deposition testimony to include annotated transcripts for Thom Seal 10/4 and 10/5/2021, prepare confidential and public versions of amended designations (1.3); draft motion to file under seal the deposition excerpts of Thom Seal and order granting (1.0); prepare amended designation and ex parte motion to seal with the Court, file with USBC and serve confidential versions upon counsel and court clerk for Judge Spraker (.3).	2.60	546.00
11/29/21	LMB	Followup with Access Transcripts and with Ron Oines from hearing transcripts on objection to Differential claims and to be used as apt of supplemental briefing.	.50	217.50

TOTAL PROFESSIONAL SERVICES

Less Discount

NET PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Hours	Rate	Total
Bubala, Louis M		435.00	0
Marsh, Merrilyn		210.00	
Total			

KAEMPFER CROWELL

December 2, 2021

Invoice No. 209974

COSTS ADVANCED

Date	Description	Amount
TOTAL COSTS ADVANCED		
TOTAL THIS INVOICE		

KAEMPFER CROWELL

December 2, 2021

Invoice No. 209974

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
208321	11/04/21			
	PREVIOUS BALANCE			
	Balance Due This Invoice			
	TOTAL BALANCE DUE			

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

January 6, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 211309
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: December 31, 2021

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

KAEMPFER CROWELL

January 6, 2022

Invoice No. 211309

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
12/02/21	LMB	Email with Ron Oines re supplemental brief on objection to Differential claims.	.10	43.50
12/05/21	LMB	Review & revise supplemental brief after hearing on objections to claims of Differential Engineering.	.60	261.00
12/06/21	LMB	Final review of supplemental brief on Differential claims for redaction & edits.	.30	130.50
12/06/21	MHM	Review, revise and reformat post-hearing opening brief, file same with the court via CM/ECF.	1.00	210.00
12/27/21	LMB	Review Differential supplemental brief in support of its bankruptcy claims; email with Ron Oines on same.	.20	87.00
12/29/21	LMB	Telephone calls & emails with trustee's counsel Mike Lehnars re timing on reply brief, testimony from hearing and circulation of hearing transcripts and exhibits; update Ron Oines on same.	.90	391.50
TOTAL PROFESSIONAL SERVICES				

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		435.00	
Marsh, Merrilyn		210.00	
Total			

TOTAL THIS INVOICE

KAEMPFER CROWELL

January 6, 2022

Invoice No. 211309

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
209974	12/02/21			
	PREVIOUS BALANCE			
	Balance Due This Invoice			
	TOTAL BALANCE DUE			

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

February 3, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 213800
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: January 31, 2022

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
BALANCE DUE THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

KAEMPFER CROWELL

February 3, 2022

Invoice No. 213800

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
1/04/22	LMB	Review & revise post-hearing reply brief on objection to Differential claims; emails with Ron Oines on same.	.60	276.00
1/04/22	LMB	Telephone call & emails with trustee's counsel Mike Lehnars re post-hearing reply on objections to Differential claims; emails with Ron Oines on same.	.60	276.00
1/05/22	LMB	Review & revise final version of post-hearing brief on objection to Differential claims.	.30	138.00
1/05/22	LMB	Review & respond to questions from trustee's counsel Mike Lehnars re payment issues on Differential claims.	.80	368.00
1/06/22	LMB	Review trustee's draft post-hearing reply brief on objection to Differential claims.	.10	46.00
TOTAL PROFESSIONAL SERVICES				

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		460.00	
Total			

TOTAL THIS INVOICE

Credits Applied

BALANCE DUE THIS INVOICE

KAEMPFER CROWELL

February 3, 2022

Invoice No. 213800

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
211309	1/06/22			
	PREVIOUS BALANCE			
	Balance Due This Invoice			
	TOTAL BALANCE DUE			

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

April 5, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 217652
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: March 31, 2022

RE: Metal Recovery Solutions

Professional Services
Costs Advanced

[REDACTED]
[REDACTED]

TOTAL THIS INVOICE

[REDACTED]

Invoice No. 217652

KAEMPFER

CROWELL

May 2, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 219925
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: April 30, 2022

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

Invoice No. 219925

KAEMPFER CROWELL

May 2, 2022

Invoice No. 219925

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		460.00	
Total			

TOTAL THIS INVOICE

KAEMPFER CROWELL

May 2, 2022

Invoice No. 219925

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
217652	4/05/22			
	PREVIOUS BALANCE			
	Balance Due This Invoice			
	TOTAL BALANCE DUE			

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

June 2, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 222187
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: May 31, 2022

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	
Previous Balance	
TOTAL BALANCE DUE	

KAEMPFER CROWELL

June 2, 2022

Invoice No. 222187

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
5/03/22	LMB	Review designation of record by Differential; emails with Ron Oines on potential additions to it; review court docket.	.80	368.00
5/04/22	LMB	Email with Ron Oines re evaluation of designation of record and response.	.10	46.00
5/04/22	LMB	Review & revise proposed additional designation of record based on Courtney Droessler review of original designation; emails with Ron Oines & Roger Friedman on additional changes.	2.00	920.00
5/04/22	CLD	Compare and contrast Creditor Differential Engineering, Inc.'s Statement of Issues on Appeal and Designation of Record on Appeal with Docket Report on case 20-50660; re determining scope of inaccuracy within designated court filings allegedly associated with issues on appeal; to assist attorney, in preparation for client's draft response.	1.20	234.00
5/04/22	CLD	Review and analyze email chain with Co-Counsel, re determining general scope while cross-referencing with '50660 docket report and exhibits for claim objection hearing starting on November 15, 2021 to obtain additional specific details, in preparation for Client's Designation of Additional Items for the record on appeal.	.60	117.00
5/04/22	CLD	Draft Client's proposed Designation of Additional Items for Record on Appeal with certificate of service.	.40	78.00
5/04/22	CLD	Draft e-correspondence to Co-Counsel with attachment; re proposed Designation of Additional Items for the Record on Appeal.	.10	19.50
5/05/22	LMB	Review & revise additional designation of record; additional legal research on federal case law on scope of the record on unadmitted exhibits and procedure to object or move to strike; email with Roger Friedman & Ron Oines on same.	2.00	920.00
5/05/22	CLD	Analyze, compare and contrast Transcripts of Evidentiary Hearing on Objection to Claims of Differential Engineering, Inc. November 15, 2021 through November 14, 2021 with Joint Exhibit List and Docket Report for '50660, re identification of exhibits submitted but not admitted, to assist with specifying those exhibits which should be excluded from the record on appeal.	.90	175.50
5/05/22	CLD	Annotate Joint Exhibit List from evidentiary hearing on objection to claims of Differential Engineering, Inc., re citations to transcripts reflecting when exhibits were admitted, to assist attorney, in preparation for revising Client's Designation of Additional Items for Record on Appeal.	.80	156.00
5/05/22	CLD	Revise Client's Designation of Additional Items for Record on Appeal, re detailed specification in objection to which evidentiary hearing exhibits should be excluded.	.30	58.50
5/06/22	LMB	Followup with Roger Friedman re dispute on unadmitted trial exhibits included in appellant's designation of record, procedure for objection or striking them, and timing for designation of record and/or motion.	.10	46.00

KAEMPFER CROWELL

June 2, 2022

Invoice No. 222187

Date	Init	Description	Hours	Amount
5/09/22	LMB	Emails with Roger Friedman and with DEI counsel Seth Adams & trustee counsel Mike Lehnert re correction on record on appeal regarding exhibits from evidentiary hearing not admitted at hearing; followup emails with Mike Lehnert and Ron Oines on same.	.80	368.00
5/10/22	LMB	Followup with DEI counsel Seth Adams and with Ron Oines re potential stipulation on designation of of evidentiary hearing exhibits not admitted in to evidence; emails with courtroom deputy David Lindersmith re potential hearing dates.	.40	184.00
5/12/22	LMB	Telephone calls & emails with Ron Oines, with Differential counsel Seth Adams and with trustee's counsel Mike Lehner re designation of appellate record; draft and revise.	.80	368.00
5/12/22	CLD	Review and analyze e-correspondence chain with Counsel for Differential Engineering, Inc. and Trustee, re scope of agreement clarifying Differential Engineering, Inc.'s Designation of Record on Appeal.	.20	39.00
5/12/22	CLD	Review and analyze Differential Engineering's court filings and Docket Report on appeal, re factual timeline on initiation of appeal and exact wording of two entries, to assist attorney, in preparation for drafting Stipulation.	.20	39.00
5/12/22	CLD	Draft and revise Stipulation Regarding Appellant's Designation of Record on Appeal, re factual background and memorialize agreement to clarify record.	.60	117.00
5/12/22	CLD	Draft [proposed] Order Approving Stipulation Regarding Appellant's Designation of Record on Appeal.	.30	58.50
5/12/22	CLD	E-correspond with Counsel for Differential Engineering, Inc. and Trustee with attachments, re draft Stipulation for approval.	.10	19.50
5/13/22	LMB	Review update exhibit list on offered & admitted evidence from claim objection to submit to court for appellate record; email with Ron Oines on same.	2.10	966.00

Invoice No. 222187

4

KAEMPFER CROWELL

June 2, 2022

Invoice No. 222187

Date	Init	Description	Hours	Amount
5/23/22	CLD	Finalize and docket Second Stipulation Regarding Appellant's Designation of Record on Appeal with supporting exhibits.	.40	78.00
5/23/22	CLD	Draft proposed Order Approving Second Stipulation Regarding Appellant's Designation of Record on Appeal.	.10	19.50
5/23/22	CLD	Submit proposed Order Approving Second Stipulation Regarding Appellant's Designation of Record on Appeal to Court.	.10	19.50
5/24/22	LMB	Emails with Seth Adams re proposed extension to filed appellate brief on claim objection; evaluate record and issues; email with Ron Oines on same.	.60	276.00
5/25/22	LMB	Emails with Ron Oines and with DEI counsel Seth Adams on limited extension to file appellate brief.	.10	46.00
5/25/22	LMB	Review proposed stipulation to extend appellate briefing; emails with DEI counsel Seth Adams and trustee's counsel Mike Lehnrs regarding details & timing.	.20	92.00
5/26/22	LMB	Review & approve revised stipulation to amend briefing schedule on DEI claim appeal.	.10	46.00
TOTAL PROFESSIONAL SERVICES				

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		460.00	
Droessler, Courtney		195.00	
Total			

TOTAL THIS INVOICE

KAEMPFER CROWELL

June 2, 2022

Invoice No. 222187

OUTSTANDING INVOICES

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
219925	5/02/22			
	PREVIOUS BALANCE			
	Balance Due This Invoice			
	TOTAL BALANCE DUE			

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

July 8, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 223599
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: June 30, 2022

RE: Metal Recovery Solutions

Professional Services	
Costs Advanced	
TOTAL THIS INVOICE	

KAEMPFER CROWELL

July 8, 2022

Invoice No. 223599

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
6/02/22	LMB	Order & circulate transcripts utilized in DEI in appellate of order denying claims.	.10	46.00
6/03/22	LMB	Review BAP order of conditional dismissal of Differential appeal, related email from Differential counsel Seth Adams, and emails with Ron Oines & Roger Friedman on same.	.10	46.00
6/08/22	LMB	Review Differential's brief seeking to set aside conditional dismissal of appeal.	.10	46.00
6/20/22	LMB	Email & telephone call with DEI counsel Seth Adams and with Ron Oines re second extension to file opening brief on DEI appeal on claim objections.	.10	46.00
6/21/22	LMB	Review & approve stipulation to extend appellate briefing schedule with Differential counsel Seth Adams.	.10	46.00
6/29/22	LMB	Initial review of Differential appellate brief on order disallowing its claims in bankruptcy; emails with Ron Oines on same.	.10	46.00
6/29/22	LMB	Respond to telephone call from Bankruptcy Appellate Panel Clerk Susan Spraul re consent to exhibits filed under seal based on stipulation to file under seal in bankruptcy court.	.10	46.00

TOTAL PROFESSIONAL SERVICES**SUMMARY OF PROFESSIONAL SERVICES**

Name	Hours	Rate	Total
Bubala, Louis M		460.00	
Total			

COSTS ADVANCED

Date	Description	Amount

KAEMPFER CROWELL

July 8, 2022

Invoice No. 223599

TOTAL COSTS ADVANCED

██████████

TOTAL THIS INVOICE

██████████

Interest at the rate of 1.5% per month will be charged on any past due invoices.

KAEMPFER

CROWELL

September 9, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 227477
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: August 31, 2022

RE: Metal Recovery Solutions

Professional Services
Costs Advanced

[REDACTED]

TOTAL THIS INVOICE

[REDACTED]

KAEMPFER CROWELL

September 9, 2022

Invoice No. 227477

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/05/22	LMB	Prepare for & telephone call/emails with Ron Oines re appellant appendix and excerpt, bankruptcy claims, leases and negotiations; followup research and advise Ron Oines re appendix, excerpts of record, and citation for responding appellant brief.	1.70	782.00
7/05/22	LMB	Markup DEI appellate opening brief for responsive brief.	1.30	598.00
7/08/22	LMB	Evaluate new law regarding compromises and sales cited by trustee's counsel in negotiations with Differential and Thom Seal.	.90	414.00
7/11/22	LMB	Emails with trustee's counsel Mike Lehner's assistant, Differential counsel Seth Adams and Ron Oines re requested extension of appeal response briefing due to Lehn's illness; telephone call with Ron Oines on same and litigation/settlement of Trustee-Differential-Seal adversary proceeding.	.40	184.00
7/12/22	LMB	Telephone call with trustee's counsel Mike Lehn's (through assistant Dolores), and email with them, trustee Chris Burke & Differential counsel Seth Adams re briefing on appeal.	.20	92.00

KAEMPFER CROWELL

September 9, 2022

Invoice No. 227477

Date	Init	Description	Hours	Amount
7/12/22	LMB	Initial review of excerpts of record filed by Differential counsel Seth Adams before Bankruptcy Appellate Panel; email with Ron Oines on same.	.10	46.00
7/13/22	LMB	Emails with Ron Oines re Differential appendix filed under seal versus excerpts of record.	.10	46.00
7/13/22	LMB	Review & revise proposed appellate brief in response to Differential appeal on its claims in bankruptcy.	.70	322.00
7/14/22	LMB	Continue review & revisions to proposed appellate brief in response to ruling on Differential claims; email with Ron Oines on same.	1.20	552.00
7/15/22	LMB	Review & revise appellate brief on Differential claims, including compliance with local rules.	1.10	506.00
7/18/22	LMB	Revise appellate response brief on Differential claims.	2.00	920.00
7/18/22	CLD	Analyze and revise Geo-Logic Associates, Inc.'s Opening Brief [22-1081], re incorporate certificate of interested parties, mandatory tables on content and authorities, and certificate of service while updating mandatory certificate of compliance on form and length, to ensure compliance with applicable rules.	1.90	370.50
7/18/22	CLD	Draft e-correspondence to Co-counsel with attachment [22-1081], re updated version of Geo-Logic Associates, Inc.'s Opening Brief for review and approval.	.10	19.50
7/19/22	LMB	Emails with Ron Oines & final revisions to appellate brief, and coordinate filing.	.20	92.00
7/19/22	LMB	Email with trustee's counsel Mike Lehnars re designation of appellate record for his response/opening brief in appeal on Differential claims.	.10	46.00
7/19/22	CLD	Revise, finalize and docket Client Geo-Logic Associates, Inc. Opening Appellee Brief [22-1081].	.50	97.50

KAEMPFER CROWELL

September 9, 2022

Invoice No. 227477

Date	Init	Description	Hours	Amount
7/28/22	LMB	Initial review of trustee's appellate brief on Differential claims.	.10	46.00
7/29/22	LMB	Review trustee's response brief in Differential appeal of order denying its claims.	.30	138.00
8/10/22	LMB	Review notice of oral argument on appeal over disallowance of Differential claims; emails with Ron Oines & Roger Friedman on same; email with appellate court clerk Susan Spraul on appearances.	.30	138.00
8/12/22	LMB	Initial review of Differential appellate brief in reply to trustee's brief in order sustaining claim objection.	.10	46.00
8/12/22	LMB	Prepare binder for oral argument on appeal of order disallowing Differential claim.	.10	46.00
8/12/22	LMB	File acknowledgment of oral argument form.	.10	46.00
8/12/22	LMB	Telephone call with trustee's counsel Mike Lehnert and email with Ron Oines re trustee-Differential communications, schedule of appellate oral argument, allocation of time for oral argument, and potential renewed claim by Differential after appeal.	.40	184.00
8/12/22	CLD	Draft and docket Client's Acknowledgement of Hearing with exhibit and certificate of service [1081].	.40	78.00
8/18/22	LMB	Prepare index of exhibits cited in appellate briefs for use during oral argument on order disallowing Differential claim.	.20	92.00

KAEMPFER CROWELL

September 9, 2022

Invoice No. 227477

Date	Init	Description	Hours	Amount
8/22/22	LMB	Legal research re preclusive effect of order sustaining objection to Differential claims and potential amended claim filed by Differential; review & circuit new Schafer decision from Sixth Circuit.	.30	138.00
TOTAL PROFESSIONAL SERVICES				

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		460.00	
Droessler, Courtney		195.00	
Mackedon, Owen		405.00	
Total			

TOTAL THIS INVOICE**Interest at the rate of 1.5% per month will be charged on any past due invoices.**

KAEMPFER

CROWELL

October 12, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 228953
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: September 30, 2022

RE: Metal Recovery Solutions

Professional Services
Costs Advanced

[REDACTED]
[REDACTED]

TOTAL THIS INVOICE

[REDACTED]

KAEMPFER CROWELL

October 12, 2022

Invoice No. 228953

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
9/14/22	LMB	Followup with Ron Oines re oral argument time allocation with trustee's counsel on appeal from order sustaining objection to Differential claims.	.10	46.00
9/14/22	LMB	Emails with Ron Oines and with trustee counsel Mike Lehnerns & trustee Chris Burke re allocation of time for oral argument before the bankruptcy appellate panel.	.10	46.00
9/15/22	LMB	Emails with trustee's counsel Mike Lehnerns and with Ron Oines re allocation of time for oral argument before bankruptcy appellate panel.	.10	46.00
9/16/22	LMB	Emails with Ron Oines, and email & calls with trustee's counsel Mike Lehnerns re oral argument on appeal of order disallowing Differential claims.	.70	322.00
9/21/22	LMB	Email with trustee's counsel Mike Lehnerns re oral argument on Differential appeal over its claims.	.20	92.00
9/27/22	LMB	Prepare papers & coordinate calendar for oral argument on appeal on Differential order denying claims; emails with Ron Oines on same.	.20	92.00
9/28/22	LMB	Telephone calls with trustee's counsel Mike Lehnerns and emails with Ron Oines re oral argument by trustee or trustee's counsel.	.20	92.00
9/29/22	LMB	Review appellate briefs and exhibits for oral argument.	3.00	1,380.00
9/29/22	LMB	Telephone call with trustee's counsel Mike Lehnerns and email with Ron Oines re points for oral argument on Differential from appeal on claim disallowance.	.50	230.00
9/29/22	LMB	Emails with Ron Oines and with trustee's counsel Mike Lehnerns re economic calculations included in trustee's appellate brief.	.10	46.00
9/30/22	LMB	Prepare for and attend oral appellate argument on Differential claims.	2.00	920.00
TOTAL PROFESSIONAL SERVICES				\$ 3,818.00

KAEMPFER CROWELL

October 12, 2022

Invoice No. 228953

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Bubala, Louis M		460.00	
Total			

TOTAL THIS INVOICE**Interest at the rate of 1.5% per month will be charged on any past due invoices.**

KAEMPFER

CROWELL

November 3, 2022

Geo-Logic Associates, Inc.
Gary Lass | GaryLass@geo-logic.com
Wendy Figueroa | wfigueroa@geo-logic.com
Megan Black | mblack@geo-logic.com

Invoice No. 230093
Client No. 18014
Matter No. 1
Billing Attorney: LMB

INVOICE SUMMARY

For Professional Services Rendered through: October 31, 2022

RE: Metal Recovery Solutions

Professional Services
Costs Advanced

██████████
██████████

TOTAL THIS INVOICE

██████████

Invoice No. 230093

Date	Init	Description	Hours	Amount
10/04/22	LMB	Review appellate court's entries re oral argument on Differential claim & manage appeal papers subject to ruling and potential additional appeal to circuit court.	.10	46.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
TOTAL PROFESSIONAL SERVICES				[REDACTED]

Name	Hours	Rate	Total
Bubala, Louis M		460.00	
Total			